

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,  
Plaintiff,**

**v.**

**Civil Action No.: 2:87-cv-00363**

**UNIDENTIFIED, WRECKED AND ABANDONED  
SAILING VESSEL, etc.,  
Defendant.**

**MOTION TO FILE UNDER SEAL**

Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, at the direction of the Court, and pursuant to local rules, moves this Court for entry of an Order filing under seal Exhibit 1 to the accompanying Memorandum in Support. Exhibit 1 is the Declaration of John B. Pidcock. The reasons for filing this document under seal are stated in the accompanying Memorandum in Support.

Accordingly, RLP moves for the entry of a sealing order to file under seal Exhibit 1 to the accompanying Memorandum in Support of Motion to File under Seal, with it remaining sealed until the entry of a final order in this matter, then returned to the filing party. A proposed order is attached to this Motion.

This 8th day of May, 2024.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983)

K. Barrett Luxhoj, Esquire (VS. No. 86302)

*Counsel for Recovery Limited Partnership*

CRENSHAW, WARE & MARTIN, PLC.

150 West Main Street, Suite 1923

Norfolk, Virginia 23510

Telephone: (757) 623-3000

Facsimile: (757) 623-5735

[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)

[kbluxhoj@cwm-law.com](mailto:kbluxhoj@cwm-law.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of May, 2024, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

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[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)

[kbluxhoj@cwm-law.com](mailto:kbluxhoj@cwm-law.com)